

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(SOUTHERN DISTRICT)**

HAGERSTOWN RECOVERY LLC
DBA THE VALLEY
19120 MUNCASTER RD.
DERWOOD, MD 20855

Plaintiff,

V.

NEW SPIRIT RECOVERY LLC
C/O ARTHUR KAZANCHIAN
17856 CATHEDRAL PL
ENCINO, CA 91316

Defendant.

* * * * *

Consented Motion for Extension of Time to Answer

Pursuant to Fed. R. Civ. P. 6(b), Defendant, New Spirit Recovery LLC, by and through undersigned counsel, with the consent of Plaintiff, respectfully moves this Honorable Court for an extension of time to file an answer or otherwise respond to the Complaint filed by Plaintiff and in support thereof states as follows:

1. Plaintiff filed the Complaint on April 17, 2025.
2. Defendant's current deadline to answer or otherwise respond to the Complaint is May 9, 2025.
3. Defendant seeks an extension of 30 days up to and including June 9, 2025, to file its answer or other responsive pleading.
4. Counsel for Defendant has conferred with counsel for Plaintiff, and Plaintiff consents to the requested extension.

5. The parties are engaged in settlement negotiations.
6. This is the first request for an extension of time, and it is not made for the purpose of delay.
7. Defendant submits that, in light of the fact that the parties have consented to the extension of time, good cause has been shown for the extension of time answer.

WHEREFORE, Defendant respectfully requests that the Court grant this Consent Motion and enter an order extending the time for Defendant to answer or otherwise respond to the Complaint up to and including **June 9, 2025**.

Respectfully submitted,

Date: 5/9/2025

LUTZKER & LUTZLER LLP

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*Counsel for Defendant,
New Spirit Recovery LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of May 2025, a copy of the foregoing document was electronically delivered to:

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By: ____/jmcarmadella/_____
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